REMARKS

Claims 1-24 remain pending in the applications with claim 12 being amended by this response. Claim 12 is amended to recite that the "system for scheduling said set of tasks includes workflow engine integrated with a clinical information system". Support for the amendment to claim 12 may be found throughout the specification and, more specifically, on page 4 and in Figure 2 (including the corresponding description thereof) of the present specification. Therefore, Applicant respectfully submits that no new matter is added by the amendment to claim 12.

Claims 1, 3-9, and 11-17 under U.S.C 103(a)

Claims 1, 3-9, and 11-17 are rejected under 35 U.S.C. 103(a) as being obvious over Dahlin (U.S. Patent Publication No. 2004/0122701) in view of Flores (U.S. Patent No. 6,073,109).

Claim 1 recites in "a system for scheduling a set of tasks to be performed by at least one individual to support healthcare delivery", a "method for providing a user interface for processing an event representing a change in circumstances potentially affecting healthcare delivered to a patient" comprising the steps of "in response to user command, initiating generation of at least one display image supporting a user in, identifying an event and an associated parameter; identifying a global parameter; designating a predetermined first process is associated with said event by associating identifiers with said event and said associated parameter, said predetermined process comprising a set of tasks to be performed by at least one individual to support healthcare delivery; designating a plurality of predetermined concurrently operable processes, including said first process, are associated with said identified global parameter for concurrently automatically sharing a value of said global parameter; and indicating a value of said associated parameter is to be provided to said first process in response to occurrence of said event; enabling access by said predetermined concurrently operable processes and sharing of said global parameter value; and providing said associated parameter to said first process using a map in at least one repository associating event identifiers and parameter identifiers". These features are not shown (or suggested) in Dahlin alone or in combination with Flores.

The system of claim 1 provides "at least one display image" for "designating a plurality of predetermined concurrently operable processes, including said first process, are associated with said identified global parameter for concurrently automatically sharing a value of said global parameter; and indicating said associated parameter is to be provided to

said first process in response to occurrence of said event". The system of claim 1 also enables "access by said predetermined concurrently operable processes and sharing of said global parameter value" and provides "said associated parameter to said first process using a map in at least one repository associating event identifiers and parameter identifiers". These features address the fact that "real healthcare processes constantly affect each other. For example, a patient being taken to radiology for a diagnostic study interferes with the administration of intravenous medication in the patient's room. Further, the complexity of modern healthcare enterprises means that a healthcare workflow process may need to be responsive to multiple different healthcare events, and also that a single event may impact multiple different concurrently operating healthcare processes". Further, the inventors have advantageously recognized "a more sophisticated mechanism is required for invoking workflow processes than existing workflow management systems currently support. The disclosed system supports creation and configuration of healthcare processes that interact with each other and respond to changes and events originating in other processes" (Application page 5 lines 12-28).

The claimed arrangement provides a display image enabling a user to designate "a plurality of predetermined concurrently operable processes, including" a "first process, are associated" with a "global parameter for concurrently automatically sharing a value of said global parameter". The arrangement also indicates an additional "associated parameter is to be provided" to the "first process in response to occurrence" of an "event" using "a map in at least one repository associating event identifiers and parameter identifiers". These features support management of concurrently operable workflows. Dahlin (with Flores) do not address this problem. Moreover, Dahlin (with Flores) fail to disclose or suggest a mechanism for sharing global parameters between concurrently operating processes in addition to receiving a process-specific parameter in response to occurrence of an event using a map associating event identifiers and parameter identifiers as in the present claimed invention.

Dahlin discloses use of "Disease Management Advisors" comprising organizations or clinicians, specifically "disease management advisors may include specialized disease management advising companies, pharmacies, insurance companies, HMOs, government agencies, medical professional societies, medical specialists, experts in particular fields of medicine, pharmacy benefits management companies, advertisers, pharmacies, labs, academic organizations, medical information publishers, research institutions, organizers of medical studies, organizers of medication trials" (Dahlin par. 0010). These "Disease Management Advisors" employ "treatment algorithms" which may comprise paper copies, for example, of "step therapy, diagnosis algorithms, treatment

algorithms, decision criteria for ordering certain tests" (Dahlin para. 0008, 0010). However, Dahlin nowhere shows or suggests designating that "a plurality of predetermined concurrently operable processes, including" a "first process, are associated" with a "global parameter for concurrently automatically sharing a value of said global parameter".

Dahlin states in par. 0074 "each treatment algorithm is associated with a particular DMA, and the healthcare EMR system **only** considers treatment algorithms indicated by the patient's own DMA and **ignores others**". Dahlin states in par. 0075, 0076 "some treatment algorithms' DMA fields may be set to the special value ALL, which indicates that they may be relevant to a patient regardless of the patient's DMA" and "some patients may have multiple DMAs and some treatment algorithms may be associated with multiple DMAs". However, treatment algorithms comprise (perhaps in paper copy form) "step therapy, diagnosis algorithms, treatment algorithms, decision criteria for ordering certain tests" (Dahlin par. 0008, 0010). So "treatment algorithms" are treatment templates of questions or activities to be performed in treatment of a patient and are NOT parameters or parameter values and do not suggest a "value" of a "global parameter" shared between "predetermined concurrently operable processes". Dahlin fails to provide any 35 USC 112 compliant teaching of enabling different concurrently active templates of questions or activities to be performed in treatment of a patient ("treatment algorithms") to exchange parameter values. Dahlin fails to recognize a need for such features and in par 0077-0082 or elsewhere fails to show or suggest such features. Dahlin also fails to show or suggest providing "said associated parameter to said first process using a map in at least one repository associating event identifiers and parameter identifiers" in addition to sharing global parameter values.

Dahlin states in par. 0079 referring to a treatment algorithm that "likewise, a set of elements may specify conditions and locations that refer to one another in order to create a logical flow **between treatment algorithm elements** (e.g., if user answers X then ask Y)". However, here Dahlin is referring to a **single** treatment algorithm and the fact that a patient answer provided to the single algorithm may change questions presented by the **single** algorithm. There is no suggestion in Dahlin in paragraphs 0077-0082 (or elsewhere) of treatment algorithms sharing a common "global parameter value" as in the present claimed invention.

The Rejection acknowledges that the affirmatively recited features of claim 1 are not expressly taught by Dahlin and cites Flores as providing the "well known" disclosure, which when combined with Dahlin obviates the present claimed invention. Applicant respectfully disagrees. Specifically, the sections cited on pages 4 and 5 of the Rejection fail to

add anything to the Dahlin system that would render the claimed arrangement unpatentable.

Flores provides a system for analyzing and structuring business processes implemented in software to provide businesses with tools to manage business processes. The Flores system "i) notifies the user that he or she has a step to begin or to complete; ii) provides the user with the proper tools to complete a task; iii) provides the user with the proper information to complete a task; iv) allows the user to see where a task fits in the overall process; v) manages proper reminders, alerts, and follow-ups to keep the process moving; vi) automates certain standard procedures; vii) integrates with the organization's existing business systems; and viii) provides application program interfaces that allow developers to develop applications that are workflow-enabled." (see Abstract). However, the Flores system fails to disclose or suggest "designating a plurality of predetermined concurrently operable processes, including said first process, are associated with said global parameter for concurrently automatically sharing a value of said global parameter" for "enabling access by said predetermined concurrently operable processes and sharing of said global parameter value" between the concurrently operating processes as in the present claimed invention.

Additionally, the cited sections of Flores fail to disclose or suggest this feature alone on in combination with the other features claimed in claim 1. Rather, Flores is a business oriented system that includes a four phased approach to generating workflows that are used in business processes. Flores utilizes a first proposal phase for requesting an action be performed, a second agreement phase whereby a user performing the request outlines the conditions leading to satisfaction of performance, a third performance phase where the actions are performed and a fourth satisfaction phase whereby the customer determines if the conditions from phase 2 have been performed (see col. 2, lines 45 – 62). The creation of workflow to satisfy customer needs is fundamentally different from the claimed workflow management method "supporting healthcare delivery" to a patient. Specifically, healthcare delivery to a patient relies on predetermined processes that may operate concurrently with one another whereby each process may supply values, that if in conflict with one another, could detrimentally affect the health of a patient. The business workflows created in Flores require and utilize negotiations between a requesting party (customer) and the performing party (business entity) in order to enable and control performance of the workflow. Only when the "conditions for satisfaction" are negotiated, can the performer use different activities that will aid performance of the request. Additionally, Flores, similarly to Dahlin, control a single workflow of multiple tasks that operate sequentially. There is no mention of, or any mechanism present in Flores (with Dahlin) that associates a global parameter with "a plurality of predetermined concurrently operable processes" and which enables access by these processes by sharing of the global parameter value.

The Rejection cites column 2, line 33, column 3, lines 30 – 36 and column 51, lines 40 – 45 of Flores as providing disclosure that, when combined with Dahlin, makes the present claimed invention unpatentable. The disclosure in columns 2 and 3 of Flores fail to provide any mechanisms that operate as claimed in present claim 1. Rather, these sections merely provide conclusory disclosure of a workflow creation system that generate workflow enabled applications to request services from a workflow server. Flores is a scheduling and integration system that creates applications specific to the workflow bargained for between requestor and performer.

Additionally, the citation of column 51 in Flores as providing a "global parameter" for linking concurrently operating processes in a workflow which may be shared and accessed by each concurrently operating process as in the claimed arrangement. Rather, the "lpOIPtr" parameter in the workflow process detailed in column 51 is a "[p]ointer to an array of structures which contains the mapping of Organization Role to Identities. In the structure ORG2ID, the application must set the GLOBAL or LOCAL flag to identify whether the ORG2ID overriding is at the BP (Business Process) level or at WF (Work Flow) level". Thus, the "lpOIPtr" is not equivalent to, nor can it logically be extended to include the present claimed "global parameter" as recited in the claimed invention. Rather the parameter identified in Flores is an organization identifier identifying which organization may perform a specific role in the workflow. This is fundamentally different from the present claimed "global parameter" which is a single value shared amongst a plurality of different but concurrently operating processes in a workflow that supports healthcare delivery to a patient. Specifically, as stated on page 13 of the present specification, "there is an advantage in employing global event associated parameters. Such a global event parameter may be associated with, and accessed by, more than one workflow process and process instance. This prevents the problem of having multiple workflow processes that interact potentially using a common event associated parameter with different incompatible values. Such a problem arises, for example, if a parameter indicating a location of a specific patient, set within a first running workflow process, is different to another location indication for the same patient maintained in a second process. This may occur for a variety of reasons such as if the patient location indication is updated at different intervals by the first and second processes or by use of a different location identification scheme by the first and second processes. The use of an individual global event parameter accessible from multiple running workflow processes prevents this problem. Thereby, a patient global event parameter indicating location (or other information item), stored at a single point, may be advantageously updated and accessed from multiple workflow processes based on a common patient identifier, for example" (Application, page 13 lines 12 – 26). Thus, the claimed "global parameter" value that is shared between concurrent processes is not disclosed or suggested by Flores alone or in combination with Dahlin.

Additionally, as stated in *KSR Int'l Co. v. Teleflex Inc.*, 127 S.Ct. 1727, 1734, 82 USPQ2d 1385, 1391 (2007), the question of obviousness is resolved on the basis of underlying factual determinations including (1) the scope and content of the prior art, (2) any differences between the claimed subject matter and the prior art, (3) the level of skill in the art. *Graham v. John Deere Co.*, 383 U.S. 1, 17-18, 148 USPQ 459, 467 (1966). Moreover, the Court explained, "[o]ften, it will be necessary for a court to look to interrelated teachings of multiple patents; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by a person having ordinary skill in the art, all in order to determine whether there was an apparent reason to combine the known elements in the fashion claimed by the patent at issue." *Id.* at 1740-41, 82 USPQ2d at 1396. The Court noted that "[t]o facilitate review, this analysis should be made explicit. *Id.* (citing *In re Kahn*, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006)) "[R]ejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness". Applicant respectfully submits that the Rejection fails to satisfy the burden required in *KSR* because the determination of obviousness made throughout the rejection amounts to conclusory statements which are not sufficient to support the conclusion of obviousness. Specifically, the Rejection states that Dahlin does not expressly teach any- of the affirmatively claimed features and merely provides minimal citation within Flores that allegedly teaches each of the claimed features. Applicant respectfully disagrees and requests an explicit analysis supporting the conclusion of obviousness.

Moreover, as discussed above, both Dahlin and Flores describe systems for creating a singular workflow process that includes multiple tasks. However, there is nothing in either Dahlin alone or in combination with Flores that discloses or suggests "identifying a global parameter" which is a parameter value that is common to a plurality of different "operable processes" that run concurrently. Rather, Dahlin (with Flores) (as discussed above individually) are merely concerned with the logical flow between tasks. Therefore, Dhalin with Flores teach away from the present claimed system due to their concern with a single and sequential tasks in a workflow . Dahlin (with Flores) fail to contemplate that "concurrently operable processes, including said first process, are associated with said global parameter for concurrently automatically sharing a value of said global parameter" as recited in the claimed invention.

Applicant further respectfully submits that there would be no motivation to combine (or modify) Dahlin with Flores to produce the present claimed system because neither Dahlin nor Flores are concerned with concurrently operating processes of a workflow as in the

claimed arrangement. Specifically, Dahlin is only concerned with a single treatment algorithm and the interaction between subsequent and previous algorithms to create a logical flow implemented by a single advisor (see Para. 0072 – 0079). However, Dahlin explicitly states that other processes of other advisors are ignored and not meshed with the algorithm being implemented. Thus, Dahlin teaches away from a system that uses a "global parameter" that is "automatically concurrently shared" between different concurrently operating processes in a workflow supporting healthcare delivery to a patient. On the other hand, Flores is concerned with providing applications for users to access a workflow server to perform certain tasks that are required in response to a negotiation or bargaining between parties which results in performance of an ultimate task that includes multiple subtasks. Flores is not at all concerned with healthcare delivery and Applicant respectfully submits that it is improper to modify a generalized business workflow application process as in Flores, with "predetermined processes" that support and affect delivery of healthcare to a patient. The workflow in the Flores system relies in parameters and tasks set by the bargaining parties and are not and cannot include predetermined healthcare processes for treating a patient. Therefore, the systems of Dahlin and Flores, individually or in combination with one another, fail to disclose or suggest each feature of claim 1 and fail to provide any suggestion that they be modified to include the features claimed in claim 1. Consequently, withdrawal of the rejection of claim 1 is respectfully requested.

Dependent claim 3 is considered to be patentable based on its dependence on claim 1. Claim 3 is also considered to be patentable because Dahlin (with Flores) does not show (or suggest) a system in which the "at least one display image supports designating a **second process**, comprising a scheduled sequence of tasks to be performed by at least one individual to support healthcare delivery, is associated with said event and determining said second process is to be at least one of, (a) **replaced** and (b) **supplemented**, by said predetermined process in response to occurrence of said event". Column 2, lines 33-37 of Flores, cited in the Rejection fails to disclose or suggest this feature. Rather, the cited section merely provides a map display of tasks for a particular workflow. There is nothing in the cited section, or elsewhere, regarding designation of a "second process" that is associated with the event and either replacing or supplementing the second process with the predetermined process in response to the event. The mere display of a task map as in Flores (with Dahlin) does not disclose or suggest the claimed feature which affirmatively changes the workflow process being implemented. Consequently, withdrawal of the rejection of claim 3 is respectfully requested.

Dependent claim 4 is considered to be patentable based on its dependence on claims 1 and 3. Claim 4 is also considered to be patentable because Dahlin (with Flores) does

not show (or suggest) a system in which the "second process is supplemented by said predetermined first process by at least one of the steps of, (a) adding said tasks of said predetermined first process to tasks of said second process, and (b) substituting at least one of said tasks of said predetermined process for a task of said second process". Contrary to the Rejection statement on page 5, Flores in column 3, lines 30 - 36 or elsewhere nowhere shows or suggests this feature combination. Rather, the cited section is a mere cursory summary of the general operation of the Flores system and provides not explicit or implicit disclosure of the feature claimed in claim 4. Moreover, as it is acknowledged the Dahlin fails to disclose or suggest this feature, there is no motivation to modify either Dahlin and/or Flores to include the present claimed feature. Thus, there is no explicit reason or analysis that supports the conclusion that the features claimed in claim 4 are obvious in view of Dahlin with Flores. Consequently, withdrawal of the rejection of claim 4 is respectfully requested.

Dependent claim 5 is considered to be patentable based on its dependence on claim 1. Claim 5 is also considered to be patentable because Dahlin (with Flores) does not show (or suggest) a system involving "designating a second process is to be at least one of, (a) replaced and (b) supplemented, by said predetermined first process in response to occurrence of said event, said second process comprising a scheduled sequence of tasks to be performed by at least one individual to support healthcare delivery and is different to said predetermined first process sequence of tasks". Similarly as discussed above, the Rejection on pages 5 and 6 cite merely conclusory statements and minimal sections of the expansive Flores reference to assert that the present claimed features are "widely known". Applicant respectfully submits that the assertion of obviousness is not supported beyond these conclusory statements. Additionally, Applicant respectfully disagrees with the assertion that it would be obvious to modify Dahlin and/or Flores because neither Flores nor Dahlin are concerned with, or provide any mechanism for "concurrently operable processes" that are "associated with said global parameter for concurrently automatically sharing a value of said global parameter".

Dependent claim 6 is considered to be patentable based on its dependence on claim 1. Claim 6 is also considered to be patentable because Dahlin (with Flores) do not show (or suggest) a "display image" that supports "designating predetermined parameter verification criteria is associated with said associated parameter". Contrary to the Rejection statement on page 6, Dahlin (with Flores) nowhere show or suggest associating "parameter verification criteria" for validating an "identified **parameter**" to "be **provided to said process** in response to occurrence of said event". This feature facilitates user configuration, via a display image, of a workflow process to dynamically adapt in response to other **concurrent workflow processes** by (during process operation) receiving medical parameters

from other concurrently operating workflow processes. As exemplified in the Application on page 9 lines 27-34, the arrangement enables "a pharmacy order for Gentamicin IV" to "be used to initiate an aminoglycoside infusion process" by passing to the infusion process "parameters such as the patient's identifier number (PTID) 612, dose (for example, 1 ml or 2 tablets) 620, time (for example, every 8 hours) 618, route (for example, intravenous) 616, and strength (for example, 80 mg/ml or 500 mg) 614 are selected via prompt element 611 which also indicates the corresponding identification label employed by the workflow process". These features are nowhere shown or suggested in Dahlin (with Flores). The Rejection erroneously cites column 90, lines 20 – 25 of Flores as obviating the above claimed features. Applicant respectfully disagrees because the cited section of Flores merely provides for verifying if a specific Identify is associated with a particular organization role. This is not equivalent to a displaying a display image enabling designation of verification criteria to be associated with the "associated parameter" of a healthcare event. Consequently, withdrawal of the rejection of claim 6 is respectfully submitted.

Dependent claim 7 is considered to be patentable based on its dependence on claims 1 and 6. Claim 7 is also considered to be patentable because Dahlin (with Flores) does not show (or suggest) a system in which "said designated predetermined parameter verification criteria comprises at least one of, (a) a value range (b) a value type and (c) a parameter symbol check". The Rejection on page 7 also cites the same section of Flores as disclosing the present claimed feature. Applicant respectfully disagrees. Rather, as discussed above, col. 90, lines 20 – 25 of Flores merely provides verifying if a specific identity is associated with an Organization. There is nothing in the cited section or elsewhere that suggests any verification criteria or the nature of the verification criteria as claimed in the present invention. Consequently, withdrawal of the rejection of claim 7 is respectfully requested.

Dependent claim 8 is considered to be patentable based on its dependence on claim 1. Claim 8 is also considered to be patentable because Dahlin (with Flores) do not show (or suggest) a system in which "said associated parameter is for use by multiple different process task sequences and is stored at a location available for access by said multiple different process task sequences". As previously explained, there is no teaching in Dahlin indicating the Dahlin treatment algorithms exchange parameter values. Additionally, contrary to the assertion made throughout the Rejection, there is no mention of "concurrently operable processes" that share a global parameter in Flores. Consequently, withdrawal of the rejection of claim 8 is respectfully requested.

Dependent claim 9 is considered to be patentable based on its dependence on

claim 1. Claim 9 is also considered to be patentable because Dahlin (with Flores) does not show (or suggest) a system involving "designating said predetermined process is associated with said identified event comprises designating an instance of said predetermined process is associated with said identified event". The Rejection merely cites the same section of Flores (col. 3, lines 30 – 36) as disclosing the present claimed feature. As discussed above, there is nothing in this section or elsewhere that describes the present claimed feature. Rather, the cited section is a conclusory statement used to justify the conclusion of obviousness and no reasonable inference can be made based on the cited section of Flores, that the feature claimed in claim 9 is obvious. Consequently, withdrawal of the rejection of claim 9 is respectfully requested.

Dependent claim 11 is considered to be patentable based on its dependence on claim 1. Consequently, withdrawal of the rejection of claim 11 is respectfully requested.

Dependent claim 12 is considered to be patentable based on its dependence on claim 1. Claim 12 is also considered to be patentable because Dahlin (with Flores) does not show (or suggest) a "system for scheduling said setoff tasks includes a workflow engine integrated with a clinical information system" as in the present claimed invention. There is no mention of an integrated workflow CIS system in Dahlin alone or in combination with Flores. Moreover, Dahlin with Flores fail to disclose or suggest that "said event comprises at least one of, (a) an event resulting from action by healthcare personnel, (b) an event generated by an operating process, (c) an event generated by patient monitoring equipment and (d) an event generated by a medical device". Contrary to the assertion in the Rejection, Dahlin in par. 0057 or the Abstract (with Flores) nowhere shows or suggests this feature combination. Consequently, withdrawal of the rejection of claim 12 is respectfully requested.

Dependent claims 13 – 15 are considered to be patentable based on their dependence on claim 1. Consequently, withdrawal of the rejection of claims 13 – 15 is respectfully requested.

Dependent claim 16 is considered to be patentable based on its dependence on claims 1 and 15. Claim 16 is also considered to be patentable because Dahlin (with Flores) does not show (or suggest) a system in which "said at least one display image supports user designation of a particular individual task of said individual tasks and said predetermined process is initiated from said user designated particular individual task upon occurrence of said event". The rejection acknowledges that Dahlin fails to disclose or suggest this feature and, once again, cites the same sections of Flores as providing the requisite disclosure of the features claimed in claim 16. However, for the reasons presented above, there is nothing in

column 3, lines 30 – 36, column 2, lines 33 – 37 or column 1, lines 26 – 31) that disclose or suggest the claimed combination which enables a user via a "display image" to designate that a "**predetermined process** is initiated **from** said user **designated particular** individual **task** upon occurrence of said event". Thereby a user can create a workflow process in which a task of one process is able to dynamically initiate a second process in response to an event. This feature combination is nowhere shown or suggested in Dahlin with Flores. Consequently, withdrawal of the rejection of claim 16 is respectfully requested.

Dependent claim 17 is considered to be patentable based on its dependence on claims 1, 15 and 16. Claim 17 is also considered to be patentable because Dahlin (with Flores) does not show (or suggest) a system in which "upon occurrence of said event, said predetermined process omits at least one task prior to said designated particular individual task". This feature combination enables a user to create a workflow process in which a task of one process is able to dynamically initiate a second process and **omit** "at least one task prior to said **designated** particular individual task" in response to an event. This feature combination is nowhere shown or suggested in Dahlin or Flores. Consequently, withdrawal of the rejection of claim 17 is respectfully requested.

In view of the above remarks and amendments to the claims, Applicant respectfully submits that Dahlin alone or in combination with Flores does not make the present invention claimed in claim 1 unpatentable. As claims 3 – 9 and 11 – 17 are dependent on claim 1, Applicant respectfully submits that these claims are also not made unpatentable by Dahlin with Flores. Consequently, withdrawal of this rejection is respectfully requested.

Claims 2, 10 and 18-24 under U.S.C. 103(a)

Claims 2, 10 and 18-24 are rejected under 35 U.S.C. 103(a) as being obvious over Dahlin (U.S. Patent Publication No. 2004/0122701) in view of Flores U.S. Patent No. 6,073,109) in further view of Stewart (U.S. Patent No. 7,015,071).

Dependent claim 2 is considered to be patentable based on its dependence on claim 1. The Rejection acknowledges the Dahlin with Flores neither discloses nor suggest the a system involving "filtering messages identifying events using said map to exclude messages conveying event identifiers unassociated with said predetermined first process from being passed to said process, wherein said at least one display image supports designating an executable procedure, for initiating a workflow process comprising a sequence of tasks to be performed by a worker or system, is associated with said event and wherein execution of said procedure is initiated in response to occurrence of said event". Dahlin does not show or

suggest "filtering messages identifying events using said map to exclude messages conveying event identifiers unassociated with said predetermined first process from being passed to said process" as recited in claim 2. The Rejection further erroneously cites column 6, lines 45 – 60 of Stewart as providing disclosing the present claimed feature.

Stewart provides an enterprise wide electronic commerce system that allows trading partners to act as participants in a complex trading process. Participants communicate with one another by joining conversations that are hosted in a collaboration space and managed by a collaboration hub. In this manner, the enterprise workflow may have an effect on, or be affected by, local workflows. The invention provides a workflow integration system for enterprise wide electronic collaboration. An embodiment of the invention includes a workflow integration system for a collaboration system that allows for sharing of workflow information between collaboration participants, comprising a collaboration server having stored thereon an enterprise workflow, a workflow server having stored thereon a participant workflow and an integration mechanism for allowing said enterprise workflow and said participant workflow to interact with one another (see Abstract). However, the section of Stewart cited in the Rejection merely discloses a true or false filtering process between an administrator and a particular trading partner. The administrator of the Stewart system may define the filter and evaluates data extracted from the message to determine if the message should be passed to the trading partner. There is nothing in Stewart that explicitly or implicitly discloses "filtering" using the "map" that associates "event identifiers and parameter identifiers" and excluding messages "conveying event identifiers **unassociated** with said predetermined first process from being passed to the process". Unlike the claimed system, the filter in Stewart prevents an entity, i.e. a trading partner, from receiving a message based on predetermined criteria in support of collaboration between entities. This communication is fundamentally different from delivery of healthcare to patients that takes into account concurrently operating treatment processes and shares a "global parameter" between these concurrent processes. Specifically, Stewart provides for user specified general filtering of messages to direct communication between parties. This is wholly unlike the present claimed invention which provides targeted filtering based on event identifiers that are not associated with the designated "first process" as determined by a map that associates healthcare process events with healthcare parameters. Additionally, there is nothing in the cited section of Stewart, that when combined with Dahlin and/or Flores, discloses (or suggests) "designating an executable procedure, for initiating a workflow process comprising a sequence of tasks to be performed by a worker or system, is associated with said event and wherein said execution of said procedure is initiated in response to occurrence of said event" as in the present claimed system.

Moreover, there is no motivation to modify either the system of Dahlin or Flores with the Stewart system because the Stewart system is merely an online interactive collaboration environment whereby different parties are able to communicate with one another in support of various business workflow processes. Stewart enables management of conversations between parties but, even when combined with Dahlin and/or Flores, fails to disclose or suggest any of the features claimed in claims 1 or 2 of the present invention. Consequently, withdrawal of the rejection of claim 2 is respectfully requested.

Dependent claim 10 is considered to be patentable based on its dependence on claim 1. Claim 10 is also considered to be patentable because Stewart (with Dahlin and Flores) do not show (or suggest) a system involving "searching a database containing records indicating active processes to identify active process instances of said predetermined process". Stewart, in column 5, lines 55 – 60 relied on in the rejection, nowhere shows or suggests this feature combination and fails to even mention a process "instance". A process "instance" is a "copy of a workflow process and may comprise a particular use of the process for a specific patient, for example" (Application page 11 lines 12-14). The Rejection states that it is well known to have an auction and search allowing sharing of common information between entities. Applicant fails to understand how an auction and search relates to searching a database for active processes as in the claimed arrangement. However, that assertion regarding sharing information is precisely the difference between Stewart and the elements of dependent claim 10. While Stewart seeks to facilitate communication between different parties, the claimed invention is concerned with concurrently operable processes for healthcare delivery wherein a global parameter value is shared between these processes to ensure continuity. These are fundamentally different and non-equivalent actions performed by different mechanisms. Consequently, withdrawal of the rejection of claim 10 is respectfully requested.

Independent claim 18 is considered to be patentable for reasons given in connection with claims 1 and 2. Consequently, withdrawal of the rejection of claim 18 is respectfully requested.

Dependent claim 19 is considered to be patentable based on its dependence on claim 18 for reasons given in connection with claims 1, 2 and 9. Consequently, withdrawal of the rejection of claim 19 is respectfully requested.

Dependent claim 20 is considered to be patentable based on its dependence on claim 18 for reasons given in connection with claims 1, 2 and 9. Consequently, withdrawal of the rejection of claim 20 is respectfully requested.

Independent claim 21 recites a method for "providing a user interface for processing an event representing a change in circumstances potentially affecting healthcare delivered to a patient" comprising "in response to user command, initiating generation of at least one display image supporting a user in, identifying an event potentially arising during a first process; identifying a parameter associated with said event; designating a second process is associated with said event by associating identifiers with said event and said parameter, said first and second processes comprising sets of concurrently active tasks to be performed by at least one individual to support healthcare delivery; and designating a value of said parameter is to be provided from said first process to said second process in response to occurrence of said event; providing said parameter value to said process using a map in at least one repository associating event identifiers and parameter identifiers; and filtering messages identifying events using said map to exclude messages conveying event identifiers unassociated with said predetermined first process from being passed to said process". These features are not shown (or suggested) in Dahlin with any of Flores or Stewart.

Independent claim 21 is considered to be patentable for reasons given in connection with claims 1 and 2. Claim 21 is also considered to be patentable because Dahlin (with Flores and/or Stewart) does not show or suggest "designating a **value**" of a "parameter" to be automatically provided from" a **"first process" to a "second process"** "comprising sets of **concurrently active** tasks to be performed by at least one individual to support healthcare delivery" in "response to occurrence of said event". As previously explained Dahlin provides "treatment algorithms" which are NOT parameters or parameter values and do not suggest a "value" of a "global parameter" shared between "predetermined concurrently operable processes". Specifically, treatment algorithms comprise "step therapy, diagnosis algorithms, treatment algorithms, decision criteria for ordering certain tests" (Dahlin par. 0008, 0010). Flores provides an application generator for creating workflow between parties to a business transaction that bargain for a particular outcome and Stewart facilitates multiparty communication between partners engaged in a particular workflow process. The combined system of Dahlin, Flores and Stewart nowhere show or suggest designating a **value** of" a parameter is to be "automatically" provided from" a **"first process" to a "second process"** that are **"concurrently active** tasks to be performed by at least one individual to support healthcare delivery" in "response to occurrence of said event" as in the present claimed invention. Consequently, withdrawal of the rejection of claim 21 is respectfully requested.

Dependent claim 22 is considered to be patentable based on its dependence on claim 21 for reasons given in connection with claims 1 - 3 and 21. Consequently, withdrawal of the rejection of claim 22 is respectfully requested.
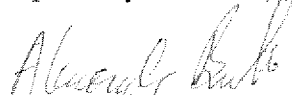
Dependent claim 23 is considered to be patentable based on its dependence on claim 21 for reasons given in connection with claims 1 – 3, 9 and 21. Consequently, withdrawal of the rejection of claim 23 is respectfully requested.

Dependent claim 24 is considered to be patentable based on its dependence on claim 21 for reasons given in connection with claims 1, 2 and 21. Claim 24 is also considered to be patentable because Dahlin (with Flores and Stewart) does not show (or suggest) a system in which "said associated parameter is for use by **multiple** different process task sequences and is stored at a location available for access by said multiple different process task sequences". This feature supports a user in designating a globally available patient parameter to be provided to multiple different concurrently operating workflow task sequences, for example, upon occurrence of an event. Consequently, withdrawal of the rejection of claim 24 is respectfully requested.

In view of the above remarks, Applicant respectfully submits that Stewart adds nothing to Dahlin and or Flores that makes the present invention as claimed in claims 1, and 21 unpatentable. As claims 2, 10 and 18 – 20 are dependent on claim 1 and claims 22 – 24 are dependent on claim 21, Applicant respectfully submits that these claims are also not made unpatentable by Dahlin with Flores and/or Stewart. Consequently, withdrawal of this rejection is respectfully requested.

Having fully addressed the Examiner's rejections, it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the applicant's attorney at the phone number below, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,

Alexander J. Burke
Reg. No. 40,425

Date: September 26, 2007

Customer No. 28524
Tel 732 321 3023
Fax 732 321 3030